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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHN DOE, *et al.*, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

This document applies to: All Actions

Case No.: 3:23-cv-02431-VC
Consolidated with: 3:23-cv-02343-VC

CLASS ACTION

**DECLARATION OF KAITLYN FRY IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF SECOND AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT**

Judge: Hon. Vince Chhabria

I, Kaitlyn Fry, hereby declare as follows:

1. I am an attorney at law licensed to practice before all courts of the State of California. I am an associate with Kiesel Law LLP.

2. I am one of the attorneys of record for Plaintiffs and the proposed Class.

3. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

4. I submit this declaration in support of Plaintiffs' Administrative Motion to Seal Portions of the Second Amended Consolidated Class Action Complaint ("SAC"), including Exhibits 1 and 2.

5. Pursuant to Local Rule 79-5(c), I hereby state that the following portions of Plaintiffs' SAC contain personally identifiable and protected health information that should be filed under seal:

ECF No.	Document	Portion(s) to Seal	Reason(s) for Sealing
158	SAC	Highlighted portions of paragraphs 36, 38, 44-46, 53, 54, 59, 60, 66, 67, 73, 74	Reveals personally identifiable and protected health information about each of the Plaintiffs, including their treating doctors, conditions, symptoms, and treatment options.
158	SAC	Highlighted portions of paragraph 90 (image).	Reveals personally identifiable information, including unique personal identifiers.
158	SAC, Exhibits 1 and 2	Entire document.	Reveals personally identifiable information, including unique personal identifiers.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 12, 2024 in Beverly Hills, California.

/s/ Kaitlyn Fry
Kaitlyn Fry

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: August 12, 2024

/s/ Melissa Gardner
Melissa Gardner